2013R00370/BLU/ADK/BAW/ms

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Kevin McNulty, U.S.D.J.
v.	:	Crim. No. 15-421 (KM)
MELVIN FELIZ,	:	STIPULATION AND ORDER
Defendant.	:	

WHEREAS, on or about August 25, 2015, defendant Melvin Feliz pleaded guilty pursuant to a plea agreement with the United States to the above-referenced Information, Count One of which charged him with wire fraud conspiracy, contrary to 18 U.S.C. § 1343, in violation of 18 U.S.C. § 1349;

WHEREAS, on August 25, 2015, the Court entered a Consent Judgment of Forfeiture (Money Judgment) and Preliminary Order of Forfeiture as to Specific Property (the "Forfeiture Order"), which imposed a criminal forfeiture money judgment on the defendant in the amount of $7,897,143 (the "Money Judgment"), ordered the defendant to forfeit all of his right, title and interest in certain Specific Property, and provided that any forfeited money and the net proceeds derived from the sale of forfeited Specific Property would be applied to the Money Judgment until the Money Judgment is satisfied in full;

WHEREAS, the amount of the Money Judgment significantly exceeds the value of the Specific Property;

WHEREAS, Keila Ravel, the wife of Melvin Feliz, is a participant in the Willkie Farr & Gallagher LLP Group Pension Plan (the "Pension Plan");

WHEREAS, the Pension Plan is being terminated;

WHEREAS, no later than January 31, 2016, Keila Ravelo may elect to receive, in lieu of an annuity, a lump sum payment (less required federal tax withholding and any early termination penalties);

WHEREAS, Keila Ravelo acknowledges that Melvin Feliz has a 50% interest in her benefits under the Pension Plan; and

WHEREAS, Keila Ravelo agrees that, in the event she receives a lump sum payment, she will immediately turn over 50% of the net lump sum payment to the United States of America for application to the Money Judgment, in partial satisfaction thereof.

NOW, THEREFORE, IT IS HEREBY STIPULATED, ORDERED, AND AGREED that:

1. Keila Ravelo, through her attorneys, shall, promptly upon receipt, provide sufficient documentation to the United States Attorney's Office to show the date and amount of the lump sum payment, the deductions and the total net payment.

2. Within five business days of receipt of payment, Keila Ravelo shall remit 50% of the lump sum payment (less required federal tax withholding and any early termination penalties) in the form of a bank or cashier's check payable to "IRS-CI Asset Forfeiture Fund" and bearing the notation "U.S. v. Melvin Feliz, 15-cr-421," and shall deliver said check to the United States

Attorney's Office, District of New Jersey, Attn: Asset Forfeiture and Money Laundering Unit, 970 Broad Street, 7th Floor, Newark, New Jersey 07102.

3. Melvin Feliz's portion of the lump sum payment will be applied to the Money Judgment, in partial satisfaction thereof.

4. Pursuant to 21 U.S.C. § 853, the United States Department of the Treasury is authorized to deposit Melvin Feliz's portion of the lump sum payment in the Treasury Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Facsimile and PDF copies of signatures shall constitute acceptable, binding signatures for the purpose of this Stipulation and Order.

6. This Stipulation and Order may be executed in counterparts, each of which shall be deemed an original, and all of which, when taken together, shall be deemed the complete Stipulation and Order.

7. This Stipulation and Order constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or agents of either party, that is not contained in this Stipulation and Order shall be enforceable.

8. Violation of the terms of this Stipulation and Order shall be considered a violation of an order of the Court.

9. This Court shall retain jurisdiction to enforce this Order, and to amend it as necessary.

PAUL J. FISHMAN
United States Attorney

Dated: 1/28/16

By: [signature]
BRIAN L. URBANO
ANDREW D. KOGAN
BARBARA A. WARD
Assistant United States Attorneys

Dated: 1/28/16

[signature]
STEVE SADOW, ESQ.
LAWRENCE S. LUSTBERG, ESQ.
JAKE F. GOODMAN, ESQ.
Attorneys for Keila Ravelo

Dated: 1/28/16

[signature]
KEILA RAVELO

ORDER

Having reviewed the foregoing Stipulation and good cause appearing, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Stipulation is So Ordered.

ORDERED this 29th day of January, 2016.

[signature]
HONORABLE KEVIN McNULTY
United States District Judge